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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF PATRICK
SCHMIDT IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MOTION FOR
ORDER TO SHOW CAUSE WHY
DEFENDANTS SHOULD NOT BE HELD
IN CONTEMPT OF THE PRELIMINARY
INJUNCTION ORDER (Dkt. 426) AND
EXPEDITED DISCOVERY ORDER (Dkt.
61) AND EXHIBITS 3, 5, AND 6
THERE TO**

1 I, Patrick Schmidt, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal portions of in its Motion for Order to Show Cause Why Defendants Should Not be Held in
8 Contempt of the Preliminary Injunction Order (Dkt. 426) and Expedited Discovery Order (Dkt. 61)
9 (“the Contempt Motion”) and Exhibits 3, 5, and 6 thereto, filed concurrently herewith (the
10 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Contempt Motion	Highlighted Portions	Defendants
Exhibits 3, 5, and 6	Entire Document	Defendants

14 3. Waymo’s Contempt Motion contains references to information that Defendants have
15 designated as confidential and/or highly confidential, and Exhibits 3, 5, and 6 thereto have been
16 designated confidential and/or highly confidential by Defendants.

17 4. Waymo expects Defendants to file one or more declarations in accordance with the
18 Local Rules.

19 I declare under penalty of perjury under the laws of the State of California and the United
20 States of America that the foregoing is true and correct, and that this declaration was executed in Los
21 Angeles, California, on June 21, 2017.

22 By /s/ Patrick Schmidt

23 Patrick Schmidt
24 Attorney for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Patrick Schmidt

/s/ Charles K. Verhoeven

Charles K. Verhoeven